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September 9, 2005

EX PARTE

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW B-204
445 12th Street, S.W.
Washington, DC 20554

> Re: *In the Matter of Petition of Qwest Corporation for Forbearance*
> *Pursuant to 47 U.S.C. § 160(c) in the Omaha Metropolitan*
> *Statistical Area* – WC Docket No. 04-223

Dear Ms. Dortch:

The Federal Communications Commission ("Commission") has requested that Qwest provide a clarification of the data provided in Tabs 7, 17 and 19 of the Data Notebooks discussed with Commission Staff on May 18, 2005 and July 25, 2005, and filed on the record May 20, 2005 and July 27, 2005. Following is Qwest's response:

Tab 7 Data Collection:
- Provides detail of Qwest Communications residential and business access line counts as of December 2004.
- This is a snapshot of all services offered by Qwest in the Omaha MSA.
- The summary level data includes residential access line counts, public payphone access lines, switched business access line counts, and non-switched access line counts
    - o The switched business access line counts include all switched business services of DS0 and above and include standard switched flat business service, Centrex, Centrex Prime, Centrex 21, Centrex Plus, Digital Switched Service (DSS), ISDN Basic, ISDN Primary Rate, Integrated T-1, PBX Trunks, Switchnet 56, Simultaneous Voice and Data Service (SVDS) and Uniform Access Solution (UAS). The line counts include only "lit" or "active" channels, consistent with the units that are the base for the Voice Grade Equivalent quantities included in the annual ARMIS reports.
    - o The non-switched (non-access) line counts include local point-to-point services, intrastate access services and interstate access services for both retail end users as well as wholesale carriers (IXCs).
- The Serving Wire Center ("SWC") breakout provides the data for the same categories of service at the wire center level.

Tab 7B Data Collection:
- This data is a subset of the non-switched (non-access) line counts found in the summary data from Tab 7 as of December 2004.
- The data in Tab 7B reflects only retail end user facility counts and excludes intrastate access services and interstate access services purchased by wholesale carriers (IXCs).
- The data is provided at both a summary level and at a SWC level.

Tab 17A-Revised Data Collection (Revised as filed on September 2, 2005)[1]
- This data is a subset of the non-switched (non-access) line counts found in the summary data from Tab 7 as of December 2004.
- The data in the revised Tab 17A reflects only retail customers who purchase non-switched private lines at DS1 levels or above.
- The non-switched (non-access) line counts include local point-to-point services and interstate access services for retail end users only.
- The non-switched access line counts exclude intrastate access services.

Tab 19 Data Collection
- The data represents only wholesale DS1 and DS3 interstate special access services purchased by carriers as of July 2004.
- The data excludes intrastate access services.
    - As previously stated, the information in the revised Tab 17A includes only retail end-user non-switched (private line/special access) services at DS1 and above. As such, there is no "overlap" between the numbers provided in the revised Tab17A and those provided in Tab 19.

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Sincerely,
/S/
Cronan O'Connell

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[1] In an ex parte filing September 2, 2005 describing how the data was counted, we stated in error that the access line counts were for only "lit" or "active" channels. That is incorrect. These access line counts are at the facility level e.g., if a retail end user purchases one (1) DS1, we count it as one (1) unit for this Tab. This is consistent with how we have counted all non-switched access lines in this proceeding.